

THE UNITED STATES BANKRUPTCY COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

EDUARDO PARTIDA

LAURA LORENA PARTIDA

Debtors

DEUTSCHE BANK NATIONAL TRUST

COMPANY, AS TRUSTEE FOR SECURITIZED

ASSET BACKED RECEIVABLES LLC TRUST

2007-NC2, MORTGAGE-PASS THROUGH

CERTIFICATES, SERIES 2007-NC2

Movant

v.

EDUARDO PARTIDA

LAURA LORENA PARTIDA

Respondents

DEBTORS' ANSWER TO MOTION OF DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR SECURITIZED ASSET BACKED RECEIVABLES LLC  
TRUST 2007-NC2, MORTGAGE- PASS THROUGH CERTIFICATES, SERIES 2007-NC2 FOR  
RELIEF FROM AUTOMATIC STAY UNDER §362 PURSUANT TO BANKRUPTCY  
PROCEDURE RULE 4001

AND NOW, this 14<sup>th</sup> day of July, 2020, the Debtors file the following ANSWER

by and through their attorney, Dawn Marie Cutaia of Pugh & Cutaia, PLLC:

1. Admitted.

2. Admitted.

3. Admitted.

4. Denied. Debtors have made all of their mortgage payments. By way of further answer, Debtors did fall behind in their payments post petition, but they have since caught up. As such, Movant does not lack adequate protection..

5. Denied. There were no foreclosure proceeding when the instant Chapter 13 Petition was filed.

6. Admitted in part; Denied in part. Debtors did fall behind but they have since caught up.

7. Denied. Debtors have caught up with all post-petition payments.

8. No response required..

9. Debtors do not have enough information personally to admit or deny all of the allegations of this paragraph..

WHEREFORE, Debtors respectfully request this Honorable Court dismiss the Motion for Relief from Stay.

Respectfully Submitted:

/s/ Dawn Marie Cutaia  
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